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# ST. MARY'S COUNTY GOVERNMENT

P.O. BOX 653 • GOVERNMENTAL CENTER • LEONARDTOWN, MARYLAND 20650  
(301) 475-5621

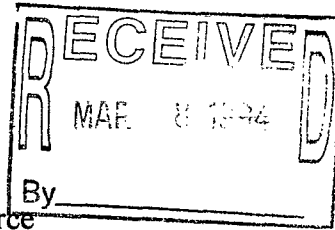
## Memorandum

To: Leslie Brunker  
Remedial Project Manager, Region III

From: Ralph Guenther, Chair *R.G. (Linda)*  
Southern Maryland Wood Treatment Plant Task Force

Re: Draft Focused Feasibility Study

Date: March 4, 1994



The Southern Maryland Wood Treatment Plant (SMWTP) Task Force met this week and reviewed the Draft Focused Feasibility Study at great length. Here are some of the questions which arose during our review. I am hopeful, that by providing these questions in advance of the upcoming public meetings, you will have an opportunity to prepare responses for presentation at these meetings. The questions are outlined in the following text.

1. There seems to be major discrepancies in the cost figures. They do not agree with past estimates. They do not agree from one alternative to another. They do not agree with themselves as indicated by the two tables in Appendix J.

Can you reconcile these differences prior to the March 16th meeting?

Can you provide the Task Force with copies of the bid documents used to generate your conceptual costs?

What is meant by the term "escalation" contained in Appendix J?

Many of the operations for Option 6 and 7 are the same, yet the cost factors used are different. Can you explain this discrepancy?

2. The write-up and presentation of cost data indicate a preference for incineration. Is this the case?

Can you provide the Task Force with information to show this "well developed and proven technology" in use on the substances, substrate, and in concentrations found at the SMWTP site?

3. There are several options showing the waste left on site with varying containment and protective systems (options 1 through 4). Why are the operating costs only included for the first 15 years?

For those options using a cap, why are cap maintenance and replacement costs not included?

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Do you intend to evaluate the potential for underlying clay failure and the cost of meeting MTR?

4. What is the process used for thermal desorption, is it distillation and recovery or distillation and destruction?

Why is a lower limit of 30 mg/kg of PCP shown in Table 2.3; does this mean that the process will not remove lower concentrations?

5. The data for bioremediation appears to be especially sketchy. What study data was used, and what studies were discarded?

What is the basis for the statement that biological treatment "may take 25 years"?

One of the bioremediations listed, the Brown-Wood site appears to be very similar to ours. How long did that clean-up take, and what was the cost?

There were some lab tests run on enhanced biological treatment offered by "Implant Technology". These tests were reported to be a failure, but no data was released, nor is it mentioned in the FFS. Can this information be included?

6. How is the "dry weight" arrived at for the "dry weight basis" in the analysis?

7. The cleanup goals appear to have changed from the original. In the absence of a new risk assessment what is the basis for these numbers, and how are they relevant to our situation?

8. Chapter Three of the NCP requires nine factors to be used in the selection of cleanup alternatives. There are six listed, plus cost, state acceptance and community acceptance. Will these last three be included in the Final FFS? There are community review meetings scheduled for mid-March, 1994. Will the community reaction to this draft be included in the Final FFS as an indication of "Community Acceptance"?

9. The on site testing of bioremediation showed less than acceptable results. At the same time, it was admitted that the conditions were not monitored and adjusted as much as might have been done under better circumstances. Can some bench scale testing be done to prove or disprove the ability of bioremediation to effectively clean this site?

We would be especially interested in a program which would adjust all the environmental factors to enhance the effects of any early positive results.

Thank you in advance for your attention to this matter. I will be out of town for the next few days but look forward to seeing you on the 16th.

cc: Stephanie Dehnhard -EPA  
Peter Ludzia -EPA  
David Sternberg -EPA  
SMWTP Task Force Members  
St. Mary's County Commissioners  
County Administrator

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